

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	<b><u>FINAL ORDER OF FORFEITURE</u></b>
	:	
-v.-	:	S3 19 Cr. 254 (ALC)
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REGINALD D. FOWLER,	:	
	:	
Defendant.	:	
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WHEREAS, on or about June 29, 2023, this Court entered an Amended Preliminary Order of Forfeiture as to Specific Property/Money Judgment (the “Preliminary Order of Forfeiture”) (D.E. 146), which ordered the forfeiture to the United States of all right, title and interest of REGINALD D. FOWLER (the “Defendant”), *inter alia*, in the following property:

- i. \$60,157,955.15 in United States currency, formerly on deposit at HSBC Securities USA/Pershing L.L.C. in Account No.: HMB861668, held in the name of Reginald D. Fowler;
- ii. \$5,917,512.06 in United States currency, formerly on deposit at HSBC Bank US, in Account No.: 0141000147, held in the name of Global Trading Solutions, L.L.C.;
- iii. \$100,000.00 in United States currency, formerly on deposit in HSBC Bank USA Account No.: 0141000201, held in the name of Spiral Global Corporation, L.L.C.;
- iv. \$3,057.71 in United States currency, formerly on deposit in HSBC Bank USA Account No.: 0697690393, held in the name of Reginald Dennis Fowler;
- v. \$2,324.24 in United States currency, formerly on deposit at HSBC Bank USA in Account No.: 0697825922, held in the name of Reginald Dennis Fowler;
- vi. \$2,003,667.79 formerly on deposit in HSBC Securities USA/Pershing LLC account HMB878886, held by Global Trading Solutions LLC;
- vii. Any and All funds held at Canadian Imperial Bank of Commerce, in account CC001006882 5108411, held in the name of GTS - Canada Corporation;

- viii. Any and All funds held at Canadian Imperial Bank of Commerce, in account CC001006882 0374016, held in the name of GTS - Canada Corporation;
- ix. Any and All funds held at Santander UK PLC Bank; in account 00080753, held in the name of Global Management Solutions Ltd.;
- x. Any and All funds held at Santander UK PLC Bank; in account 10379431, held in the name of Global Management Group Ltd.;
- xi. Any and All funds held at Santander UK PLC Bank; in account 10446319, held in the name of CIA Technology Global Ltd.; and
- xii. Any and All funds held at Santander UK PLC Bank; in account 10446322, held in the name of CIA Technology Global Ltd.

(the “Specific Property”);

WHEREAS, the Preliminary Order of Forfeiture directed the United States to publish, for at least thirty (30) consecutive days, notice of the Preliminary Order of Forfeiture, notice of the United States’ intent to dispose of the Specific Property, and the requirement that any person asserting a legal interest in the Specific Property must file a petition with the Court in accordance with the requirements of Title 21, United States Code, Sections 853(n)(2) and (3). Pursuant to Section 853(n), the United States could, to the extent practicable, provide direct written notice to any person known to have an alleged interest in the Specific Property and as a substitute for published notice as to those persons so notified;

WHEREAS, the provisions of Title 21, United State Code, Section 853(n)(1), Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure, and Rules G(4)(a)(iv)(C) and G(5)(a)(ii) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, require publication of a notice of forfeiture and of the Government’s intent to dispose of the Specific Property before the United States can have clear title to the Specific Property;

WHEREAS, the Notice of Forfeiture and the intent of the United States to dispose of the Specific Property was posted on an official government internet site ([www.forfeiture.gov](http://www.forfeiture.gov)) beginning on November 16, 2023, for thirty (30) consecutive days, through December 15, 2023, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions and proof of such publication was filed with the Clerk of the Court on April 10, 2024 (D.E. 159);

WHEREAS, on or about November 28, 2023, notice of the Preliminary Order of Forfeiture was emailed to the following:

Alliance of American Football  
c/o Jonathon Farahi, Esq.  
16001 Ventura Blvd, Suite 200  
Encino, CA 91436  
[jfarahi@actslaw.com](mailto:jfarahi@actslaw.com)

Ms. Anja Wilkens  
c/o Kanzlei Rechtsanwalt Lars Beck  
Willy-Brandt-Platz 7  
28215 Bremen  
Germany  
[beck@kanzlei-hbf.de](mailto:beck@kanzlei-hbf.de)

BTG Trading, Ltd. (“BTG”)  
c/o Jacqueline C. Wolff, Esq.  
Manatt, Phelps & Phillips, LLP  
7 Times Square,  
New York, NY 10036  
[JWolff@manatt.com](mailto:JWolff@manatt.com)

CIA TECHNOLOGY LIMITED  
c/o Andrew Laycock MA (Cantab)  
Carrick Read Solicitors  
12 Park Place  
Leeds LS1 2RU  
United Kingdom  
[ALaycock@carrickread.com](mailto:ALaycock@carrickread.com)

Epsilon-One  
c/o Mr. Mack Nevill, CEO  
[mnv@epsilonone.io](mailto:mnv@epsilonone.io)

iFinex Inc., d/b/a “Bitfinex  
c/o Jason Weinstein, Esq.  
Steptoe & Johnson  
1330 Connecticut Avenue, NW  
Washington, DC 20036  
[jweinstein@Steptoe.com](mailto:jweinstein@Steptoe.com)

Mr. Nicolas Gunden  
c/o Jacqueline C. Wolff, Esq.  
Misa Eiritz, Esq.  
Manatt, Phelps & Phillips, LLP  
7 Times Square,  
New York, NY 10036  
[JWolff@manatt.com](mailto:JWolff@manatt.com) and [meiritz@manatt.com](mailto:meiritz@manatt.com)

Sarnia Biofuels  
c/o Mr. Norman J. Groot, LL.B., CFE, CFI  
1100-350 Bay Street  
Toronto, ON M5H 2S6  
CANADA  
[ngroot@investigationcounsel.com](mailto:ngroot@investigationcounsel.com)

Shift Markets Group Inc., Shift Forex LLC and CapXM LLC  
c/o Sarah Fehm Stewart, Esq.  
Duane Morris LLP  
103 7 Raymond Boulevard, 18th Floor  
Newark, New Jersey 07102  
[sfstewart@duanemorris.com](mailto:sfstewart@duanemorris.com)

(the “Noticed Parties”);

WHEREAS, thirty (30) days have expired since final publication of the Notice of Forfeiture and no petitions or claims to contest the forfeiture of the Specific Property have been filed;

WHEREAS, the Defendant and the Noticed Parties are the only individuals and/or entities known by the Government to have a potential interest the Specific Property; and

WHEREAS, pursuant to Title 21, United States Code, Section 853(n)(7), the United States shall have clear title to any forfeited property if no petitions for a hearing to contest

the forfeiture have been filed within thirty (30) days of final publication of notice of forfeiture as set forth in Title 21, United States Code, Section 853(n)(2);

NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED THAT:

1. All right, title and interest in the Specific Property is hereby forfeited and vested in the United States of America, and shall be disposed of according to law.

2. Pursuant to Title 21, United States Code, Section 853(n)(7) the United States of America shall and is hereby deemed to have clear title to the Specific Property.

3. The United States Marshals Service (or its designee) shall take possession of the Specific Property and dispose of the same according to law, in accordance with Title 21, United States Code, Section 853(h).

Dated: New York, New York  
April \_\_, 2024

SO ORDERED:

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HONORABLE ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE